

**YES, IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

SMARTMATIC USA CORP.,
SMARTMATIC INTERNATIONAL
HOLDING B.V., and SGO
CORPORATION LIMITED,

Plaintiffs,

v.

MICHAEL J. LINDELL and MY
PILLOW, INC.,

Defendants.

Case No. 22-cv-0098-JMB-JFD

**DECLARATION OF TIMOTHY M. FREY IN SUPPORT OF SMARTMATIC'S
OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

I, Timothy M. Frey, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am over the age of 18, I am competent to make this declaration, and I have personal knowledge of the facts stated herein. These facts are true to the best of my knowledge, information, and belief, and if called upon to testify as a witness, I could and would testify competently to them.

2. I am an attorney at the law firm Benesch, Friedlander, Coplan & Aronoff, LLP, and I represent Plaintiffs Smartmatic USA Corp., Smartmatic International Holding B.V., and SGO Corporation Limited ("Smartmatic") in the above-captioned lawsuit.

3. Attached to Smartmatic's Memorandum of Law in Opposition to Defendants' Motion for Summary Judgment are true and correct copies of the exhibits

listed in the below Index. The exhibits listed in the Index are exhibits cited in Smartmatic's Memorandum of Law in Opposition to Defendants' Motion for Summary Judgment.

**INDEX OF EXHIBITS TO PLAINTIFFS' OPPOSITION TO DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT**

Exhibit No.	Description
130	Declaration of Antonio A. Mugica
131	<i>Smartmatic v. Fox</i> Compl. Ex. 85, 11/27/20 Smartmatic Website, <i>Smartmatic Fact-checked</i>
132	<i>Smartmatic v. Fox</i> Compl. Ex. 128, Smartmatic Website, <i>Los Angeles County – Voting Solutions for All People</i>
133	<i>Smartmatic v. Fox</i> Compl. Ex. 83, 11/14/20 Smartmatic Website, <i>Smartmatic Fact-checked</i>
134	<i>Smartmatic v. Fox</i> Compl. Ex. 84, 11/16/20 Smartmatic Website, <i>Smartmatic Fact-checked</i>
135	<i>Smartmatic v. Fox</i> Compl. Ex. 86, Smartmatic Website, <i>Facts About Smartmatic</i>
136	Deposition Exhibit 627, DEF001068–69, December 23, 2020 Correspondence from Counsel for Dominion to Michael J. Lindell Document produced by Defendants
137	Deposition Exhibit 628, DEF000718–19, January 8–9, 2021 Correspondence between Michael J. Lindell and Counsel for Dominion Document produced by Defendants
138	Complaint and Demand for Jury Trial, <i>US Dominion, Inc., et al. v. Sidney Powell, et al.</i> , Case No. 1:21:cv-00040-CJN (D.D.C.)
139	Complaint and Demand for Jury Trial, <i>US Dominion, Inc., et al. v. My Pillow Inc., et al.</i> , Case No. 1:21:cv-00445 (D.D.C.)
140	<i>Smartmatic v. Fox</i> Compl. Ex. 144, NCSL Voting System Standards, <i>Testing and Certification</i>
141	<i>Smartmatic v. Fox</i> Compl. Ex. 145, U.S. EAC System Certification Process and Table of Voting Systems
142	<i>Smartmatic v. Fox</i> Compl. Ex. 115, 11/5/19 FBI National Press Office, <i>Joint Statement from DOJ, DOD, DHS, DNI, FBI, NSA, and CISA on Ensuring Security of 2020 Elections</i>
143	<i>Smartmatic v. Fox</i> Compl. Ex. 120, 9/24/20 CNN Transcript
144	<i>Smartmatic v. Fox</i> Compl. Ex. 124, 11/4/20 Post-Election Joint Statement from NASS and NASED
145	<i>Smartmatic v. Fox</i> Compl. Ex. 122, 10/30/20 NASS and NASED 2020 Election Preparations and Reminders

Exhibit No.	Description
146	<i>Smartmatic v. Fox</i> Compl. Ex. 130, 11/12/20 Cybersecurity & Infrastructure Security Agency, <i>Joint Statement from Elections Infrastructure Government Coordinating Council & the Election Infrastrucutre Sector Coordinating Executive Committee</i>
147	<i>Smartmatic v. Fox</i> Compl. Ex. 141, 11/30/20 CBS News, <i>Fired Director of U.S. Cyber Agency Chris Krebs Explains Why President Trump's Claims of Election Interference Are False</i>
148	<i>Smartmatic v. Fox</i> Compl. Ex. 142, 12/1/20 AP Article, <i>Disputing Trump, Barr says no widespread election fraud</i>
149	Deposition Exhibit 591, DEF036030, Text Exchange Between Mike Lindell and Corey Lewandowski Document Produced by Defendants
150	<i>Smartmatic v. Fox</i> Compl. Ex. 55, 11/19/20 Georgia Risk-Limiting Audit Report
151	<i>Smartmatic v. Fox</i> Compl. Ex. 56, 11/19/20 Georgia Secretary of State, <i>Historic First Statewide Audit of Paper Ballots Upholds Result of Presidential Race</i>
152	<i>Smartmatic v. Fox</i> Compl. Ex. 57, 11/30/20 Georgia Press Conference on 2020 Election Recount Update Transcript
153	<i>Smartmatic v. Fox</i> Compl. Ex. 59, 1/6/21 Georgia Secretary of State Letter to Congress
154	<i>Smartmatic v. Fox</i> Compl. Ex. 63, 1/5/21 Michigan Secretary of State, <i>Michigan's election was secure and fair, and the results are accurate</i>
155	<i>Smartmatic v. Fox</i> Compl. Ex. 67, 11/12/20 Tweet from Governor Tom Wolf
156	<i>Smartmatic v. Fox</i> Compl. Ex. 68, 11/13/20 Governor Tom Wolf: <i>U.S. Election was 'most secure in American history' Federal Agency says</i>
157	<i>Smartmatic v. Fox</i> Compl. Ex. 70, 12/1/20 Tweet from Gov. Doug Ducey
158	<i>Smartmatic v. Fox</i> Compl. Ex. 135, 11/16/20 Reuters Article, <i>Fact check: the U.S. military has not seized election servers in Germany</i>
159	<i>Smartmatic v. Fox</i> Compl. Ex. 75, 11/5/20 Nevada Governor, Gov. Sisolak issues statement on President Trump's comments on the election
160	November 12, 2020 archived Twitter.com post from former Pennsylvania Governor Tom Wolf
161	<i>Smartmatic v. Fox</i> Compl. Ex. 73, 11/16/20 Wisconsin Elections Commission, <i>Did Dominion Voting Equipment Slip Votes from Trump to Biden</i>
162	DEF023750, February 8–9, 2021 Email Exchange Between Sidney Powell, Mike Lindell, Joe Flynn, and Patrick Byrne

Exhibit No.	Description
	Document produced by Defendants
163	DEF029266, May 3, 2021 Email from Maarten Schenk to Mike Lindell Document produced by Defendants
164	DEF019135, July 25, 2021 Email Exchange Between Mike Lindell, Katelyn Gamlin, and Pete Santilli Document produced by Defendants
165	DEF035985, Text Exchange Between Jerry Johnson and Mike Lindell Document produced by Defendants
166	<i>Smartmatic v. Fox</i> Compl. Ex. 131, 11/13/20 Scytll Website, <i>Scytll strongly denies the false information related to the U.S. elections</i>
167	August 8, 2024 Deposition of Benjamin Cotton
168	August 15, 2021 Insider, <i>Here's what happened at Mike Lindell's cyber symposium, from him storming offstage to Bolsonaro's son giving him a MAGA hat signed by Trump</i>
169	DEF035558, Text Message Exchange between Mike Lindell and Mary Fanning Document produced by Defendants
170	August 16, 2023 Deposition of Robert Zeidman
171	October 11, 2023 Deposition of Dennis Montgomery
172	July 19, 2023 Deposition of Douglas Frank
173	Deposition Exhibit 110, Resume of Douglas Frank
174	Deposition Exhibit 112, Justin Grimmer & Matthew Tyler, <i>High Correlation Between Predicted and Actual Ballots Do Not Imply Fraud</i>
175	Deposition Exhibit 113, John Henderson, <i>Analysis of the Dr. Douglas G. Frank voter fraud theory</i>
176	Deposition Exhibit 120, December 22, 2021 Washington Post, <i>Inside the nonstop pressure campaign by Trump allies to get election officials to revisit the 2020 vote</i>
177	August 2, 2023 Deposition of Ret. Gen. Michael Flynn
178	December 1, 2017 New York Times, <i>Michael Flynn Pleads Guilty to Lying to the F.B.I and Will Cooperate with Russia Inquiry</i>
179	January 8, 2021 NBC News, <i>Twitter bans Michael Flynn, Sidney Powell in QAnon account purge</i>
180	August 9, 2024 Deposition of Douglas Bania
181	February 1, 2023 Appearance on Jimmy Kimmel Live!, <i>MyPillow Mike Lindell's Interview from Inside a Claw Machine</i> Certified transcript
182	<i>Smartmatic v. Fox</i> Compl. Ex. 74, Nevada Secretary of State, <i>Voting System Testing and Security List</i>
183	<i>Smartmatic v. Fox</i> Compl. Ex. 69, Arizona Secretary of State, <i>2020 Election Cycle/Voting Equipment</i>

Exhibit No.	Description
184	<i>Smartmatic v. Fox</i> Compl. Ex. 54, 8/9/19 Georgia Secretary of State, Dominion Voting Systems Certification
185	<i>Smartmatic v. Fox</i> Compl. Ex. 64, Pennsylvania Department of State, <i>Electronic Voting Systems Certified After January 1, 2018</i>
186	<i>Smartmatic v. Fox</i> Compl. Ex. 60, Michigan Voter Information Center, <i>Voting Systems Map</i>
187	<i>Smartmatic v. Fox</i> Compl. Ex. 71, Wisconsin Election Commission, <i>Voting Equipment List by Municipality February 2020</i>
188	<i>Smartmatic v. Fox</i> Compl. Ex. 61, Michigan Secretary of State Jocelyn Benson, <i>Voting System Purchase</i>
189	<i>Smartmatic v. Fox</i> Compl. Ex. 66, Votes PA: <i>New Voting Systems</i>
190	<i>Smartmatic v. Fox</i> Compl. Ex. 72, Wisconsin Election Commission, <i>Voting Equipment</i>
191	<i>Smartmatic v. Fox</i> Compl. Ex. 96, 11/1/20 ES&S Website, <i>Getting the facts straight about elections</i>
192	<i>Smartmatic v. Fox</i> Compl. Ex. 97, 11/11/20 ES&S Website, <i>ES&S Equipment Efficiently, Accurately, Securely Records Election History</i>
193	<i>Smartmatic v. Fox</i> Compl. Ex. 98, 11/26/20 ES&S Website, <i>Getting the facts straight about elections updated</i>
194	<i>Smartmatic v. Fox</i> Compl. Ex. 99, 9/25/20 Hart Website, <i>Voting System Security Technology</i>
195	<i>Smartmatic v. Fox</i> Compl. Ex. 100, 9/28/20 Hart Website, <i>More Texas Counties Choose Hart InterCivic's Verity Voting</i>
196	<i>Smartmatic v. Fox</i> Compl. Ex. 87, 11/1/20 Dominion Website, <i>About Dominion</i>
197	<i>Smartmatic v. Fox</i> Compl. Ex. 146, Verified Voting Website, <i>The Verifier – Search – November 2020</i>
198	<i>Smartmatic v. Fox</i> Compl. Ex. 134, 11/16/20 Letter from Election Security Specialists
199	<i>Smartmatic v. Fox</i> Compl. Ex. 137, 11/19/20 Verify, <i>No evidence that presidential election votes were tallied overseas</i>
200	<i>Smartmatic v. Fox</i> Compl. Ex. 76, Facts v. Myths: Nevada 2020 Post-General Election
201	<i>Smartmatic v. Fox</i> Compl. Ex. 126, 11/10/20 NYT Article, <i>The Times Called Officials in Every State: No Evidence of Voter Fraud</i>
202	Deposition Exhibit 594, DEF081585, Text Exchange Between Mike Lindell and Steve Bannon Document Produced by Defendants
203	<i>Smartmatic v. Fox</i> Compl. Ex. 88, 11/7/20 Dominion Website, <i>Statement on Viral Claims/Rumors About Dominion Voting Systems</i>

Exhibit No.	Description
204	<i>Smartmatic v. Fox</i> Compl. Ex. 90, 11/13/20 Dominion Website, <i>Election 2020: Setting the Record Straight: Facts & Rumors</i>
205	<i>Smartmatic v. Fox</i> Compl. Ex. 91, 11/17/20 Dominion Website, <i>Setting the Record Straight, Facts & Rumors</i>
206	<i>Smartmatic v. Fox</i> Compl. Ex. 95, 12/3/20 Dominion Website, <i>Election 2020: Setting the Record Straight: Facts & Rumors</i>
207	<i>Smartmatic v. Fox</i> Compl. Ex. 92, 11/21/20 Dominion Website, <i>Election 2020: Setting the Record Straight, Fact Versus Rumors</i>
208	<i>Smartmatic v. Fox</i> Compl. Ex. 94, 11/26/20 Dominion Website, <i>Statement from Dominion on Sidney Powell's Charges</i>
209	<i>Smartmatic v. Fox</i> Compl. Ex. 138, 11/19/20 AP Article, <i>AP Fact Check: Trump legal team's batch of false vote claims</i>
210	<i>Smartmatic v. Fox</i> Compl. Ex. 133, 11/15/20 AP Article, <i>False reports claim election servers were seized in Germany</i>
211	<i>Smartmatic v. Fox</i> Compl. Ex. 127, 11/10/20 Los Angeles Times Article, <i>L.A.'s \$300-million voting systems gets high marks as votes trickle in across California</i>
212	<i>Smartmatic v. Fox</i> Compl. Ex. 50, 10/1/20 California Secretary of State Press Release, <i>Los Angeles County Launches VSAP 2.1 Voting System Certified</i>
213	<i>Smartmatic v. Fox</i> Compl. Ex. 53, 12/15/20 California Secretary of State Website, <i>Voting Technologies Approved for Use in California</i>
214	<i>Smartmatic v. Fox</i> Compl. Ex. 51, 10/1/20 California Secretary of State, <i>Conditional Approval of Los Angeles County's Voting Solutions for All People (VSAP) 2.1 Voting Systems</i>
215	<i>Smartmatic v. Fox</i> Compl. Ex. 125, 11/4/20 Statement from CISA Director Krebs Following Final Day of Voting
216	<i>Smartmatic v. Fox</i> Compl. Ex. 147, CISA, <i>#Protect2020 Rumor vs. Reality</i>
217	<i>Smartmatic v. Fox</i> Compl. Ex. 105, 9/21/12 Smartmatic Press Release, <i>Carter States that Election Process in Venezuela is "Best in the World"</i>
218	December 11, 2020, Washington Post, <i>Sidney Powell's secret 'military intelligence expert,' key to fraud claims in election lawsuits, never worked in military intelligence</i>
219	December 14, 2020 The Detroit News, <i>Michigan election officials slam report on votes in Antrim County</i>
220	Michigan Department of State, AG, <i>SOS: Plaintiff's report in Antrim County election lawsuit demonstrates lack of credible evidence of widespread fraud or wrongdoing</i>
221	December 16, 2020 Detroit Free Press, <i>Former election security chief for Trump knocks down Antrim County report</i>

Exhibit No.	Description
222	December 15, 2020 Associated Press, <i>Report spreads debunked claims about Dominion machines in Michigan county</i>
223	December 18, 2020 Factcheck.org, <i>Audit in Michigan County Refutes Dominion Conspiracy Theory</i>
224	December 3, 2020 United States Election Assistance Commission, <i>How the U.S. Election Assistance Commission Facilitates Fair and Secure Elections</i>
225	December 4, 2020 The Detroit News, <i>Why 8 claims from Rudy Giuliani's Michigan witnesses don't add up</i>
226	Complaint and Demand for Jury Trial, <i>US Dominion, Inc., et al. v. Rudolph W. Giuliani</i> , Case No. 1:21-cv-00213 (D.D.C.)
227	November 17, 2020 NBC News 12, <i>Republican Maricopa County chairman says "no evidence of fraud or misconduct" in presidential election</i>
228	December 4, 2020 retrieved Twitter.com post by Katie Hobbs
229	<i>Dominion v. Powell</i> Compl. Ex. 1, Statement of Georgia Secretary of State Brad Raffensperger
230	<i>Dominion v. Powell</i> Compl. Ex. 12, Georgia Secretary of State, <i>3rd Strike Against Voter Fraud Claims Means They're Out After Signature Finds No Fraud</i>
231	<i>Dominion v. Powell</i> Compl. Ex. 13, January 3, 2021 Washington Post, <i>Here's the full transcript and audio of the call between Trump and Raffensperger</i>
232	<i>Dominion v. Powell</i> Compl. Ex. 16, November 10, 2020 New York Times, <i>The Times Called Officials in Every State: No Evidence of Voter Fraud</i>
233	<i>Dominion v. Powell</i> Compl. Ex. 15, December 18, 2020 Associated Press, <i>Trump still wins small Michigan county after hand recount</i>
234	November 17, 2020 Letter from Maricopa County, Arizona Board of Supervisors Chairman Clint Hickman <i>Dominion v. Powell</i> Compl. Paragraph 50 n.22
235	<i>Dominion v. Powell</i> Compl. Ex. 19, November 12, 2020 Cybersecurity & Infrastructure Security Agency, <i>Joint Statement From Elections Infrastructure Government Coordinating Council & The Election Infrastructure Sector Coordinating Executive Committees</i>
236	<i>Dominion v. Powell</i> Compl. Ex. 35, November 21, 2020 Associated Press, <i>Georgia officials certify election results showing Biden win</i>
237	<i>Dominion v. Powell</i> Compl. Ex. 43, December 1, 2020 Associated Press, <i>Disputing Trump, Barr says no widespread election fraud</i>
238	<i>King v. Whitmer</i> , Opinion and Order Denying Plaintiffs' 'Emergency Motion for Declaratory, Emergency, and Permanent Injunctive Relief'

Exhibit No.	Description
	<i>Dominion v. Powell</i> Compl. Paragraph 81
239	<i>Bower v. Ducey</i> , Order <i>Dominion v. Powell</i> Compl. Paragraph 82
240	<i>Dominion v. Lindell</i> Compl. Ex. 19, November 12, 2020 Cybersecurity & Infrastructure Security Agency, <i>Joint Statement From Elections Infrastructure Government Coordinating Council & The Election Infrastructure Sector Coordinating Executive Committees</i>
241	Smartmatic Defendants' Memorandum in Support of Their Motion to Dismiss, <i>US Dominion, Inc., et al. v. My Pillow Inc., et al.</i> , Case No. 21-cv-445-CJN (D.D.C.), ECF No. 94-1
242	<i>Dominion v. Lindell</i> Compl. Ex. 43, December 1, 2020 Associated Press, <i>Disputing Trump, Barr says no widespread election fraud</i>
243	<i>Dominion v. Lindell</i> Compl. Ex. 11, Georgia Secretary of State, <i>Historic First Statewide Audit of Paper Ballots Upholds Result of Presidential Race</i>
244	Deposition Exhibit 631, DEF019282, January 1, 2021 Email Exchange Between Scott Hennen, Sen. Kevin Cramer, and Mike Lindell Document produced by Defendants
245	Deposition Exhibit 632, DEF029858, January 2, 2021 Email Exchange Between Scott Hennen and Mike Lindell Document produced by Defendants
246	Deposition Exhibit 636, DEF034862, Text Exchange Between Kim Rasmussen and Mike Lindell Document produced by Defendants
247	Deposition Exhibit 637, February 5, 2021 Business Insider, <i>MyPillow CEO Mike Lindell is releasing a 3-hour movie he made over the past 5 days pushing a baseless election claim involving China</i>
248	Deposition Exhibit 667, March 12, 2021 Minneapolis Star-Tribune, <i>Mike Lindell's biggest gamble: Giving hard sell to baseless election fraud claims</i>
249	DEF023750, February 8–9, 2021 Email Exchange Between Sidney Powell, Mike Lindell, Joe Flynn, and Patrick Byrne Document produced by Defendants
250	DEF029266, May 3, 2021 Email from Maarten Schenk to Mike Lindell Document produced by Defendants
251	DEF035985, Text Exchange Between Jerry Johnson and Mike Lindell Document produced by Defendants
252	DEF019135, July 25, 2021 Email Exchange Between Mike Lindell, Katelyn Gamlin, and Pete Santilli Document produced by Defendants
253	Declaration of Dr. Jonah Berger

Exhibit No.	Description
254	Declaration of Dr. Kevin Keller
255	Declaration of Tammy Patrick
256	September 28, 2023 Deposition of Antonio A. Mugica
257	September 27, 2023 Deposition of Antonio A. Mugica
258	SMARTMATIC-LINDELL04291507, Email received by Smartmatic Produced by Smartmatic in this litigation
259	SMARTMATIC-LINDELL04291654, Email received by Smartmatic Produced by Smartmatic in this litigation
260	SMARTMATIC-LINDELL04291838, Email received by Smartmatic Produced by Smartmatic in this litigation
261	SMARTMATIC-LINDELL04510063, Email received by Smartmatic Produced by Smartmatic in this litigation
262	Group Exhibit of threatening emails received by Smartmatic from February 4, 2021 through 2022 All documents (262a–262rr) were produced by Smartmatic in this litigation
262b	SMARTMATIC-LINDELL04291508 - SMARTMATIC- LINDELL04291508
262c	SMARTMATIC-LINDELL04291509 - SMARTMATIC- LINDELL04291509
262d	SMARTMATIC-LINDELL04291511 - SMARTMATIC- LINDELL04291511
262e	SMARTMATIC-LINDELL04291512 - SMARTMATIC- LINDELL04291512
262f	SMARTMATIC-LINDELL04291518 - SMARTMATIC- LINDELL04291518
262h	SMARTMATIC-LINDELL04291522 - SMARTMATIC- LINDELL04291522
262i	SMARTMATIC-LINDELL04291526 - SMARTMATIC- LINDELL04291526
262j	SMARTMATIC-LINDELL04291527 - SMARTMATIC- LINDELL04291527
262k	SMARTMATIC-LINDELL04291528 - SMARTMATIC- LINDELL04291528
262l	SMARTMATIC-LINDELL04291530 - SMARTMATIC- LINDELL04291530
262n	SMARTMATIC-LINDELL04291532 - SMARTMATIC- LINDELL04291532
262o	SMARTMATIC-LINDELL04291533 - SMARTMATIC- LINDELL04291533

Exhibit No.	Description		
262p	SMARTMATIC-LINDELL04291540	-	SMARTMATIC-LINDELL04291540
262r	SMARTMATIC-LINDELL04291526	-	SMARTMATIC-LINDELL04291526
262s	SMARTMATIC-LINDELL04291527	-	SMARTMATIC-LINDELL04291527
262t	SMARTMATIC-LINDELL04291528	-	SMARTMATIC-LINDELL04291528
262u	SMARTMATIC-LINDELL04291530	-	SMARTMATIC-LINDELL04291530
262w	SMARTMATIC-LINDELL04291623	-	SMARTMATIC-LINDELL04291623
262y	SMARTMATIC-LINDELL04291639	-	SMARTMATIC-LINDELL04291639
262z	SMARTMATIC-LINDELL04291663	-	SMARTMATIC-LINDELL04291663
262aa	SMARTMATIC-LINDELL04291648	-	SMARTMATIC-LINDELL04291648
262bb	SMARTMATIC-LINDELL04291654	-	SMARTMATIC-LINDELL04291654
262cc	SMARTMATIC-LINDELL04291661	-	SMARTMATIC-LINDELL04291661
262dd	SMARTMATIC-LINDELL04291835	-	SMARTMATIC-LINDELL04291835
262ee	SMARTMATIC-LINDELL04291837	-	SMARTMATIC-LINDELL04291837
262ff	SMARTMATIC-LINDELL04291839	-	SMARTMATIC-LINDELL04291839
262gg	SMARTMATIC-LINDELL04291840	-	SMARTMATIC-LINDELL04291840
262hh	SMARTMATIC-LINDELL04291623	-	SMARTMATIC-LINDELL04291623
262jj	SMARTMATIC-LINDELL04291639	-	SMARTMATIC-LINDELL04291639
262kk	SMARTMATIC-LINDELL04291842	-	SMARTMATIC-LINDELL04291842
262ll	SMARTMATIC-LINDELL04495471	-	SMARTMATIC-LINDELL04495471
262mm	SMARTMATIC-LINDELL04510064	-	SMARTMATIC-LINDELL04510064

Exhibit No.	Description
262nn	SMARTMATIC-LINDELL04510072 - SMARTMATIC-LINDELL04510072
262oo	SMARTMATIC-LINDELL04291842 - SMARTMATIC-LINDELL04291842
262pp	SMARTMATIC-LINDELL04495476 - SMARTMATIC-LINDELL04495476
262qq	SMARTMATIC-LINDELL04495473 - SMARTMATIC-LINDELL04495473
262rr	SMARTMATIC-LINDELL04495477 - SMARTMATIC-LINDELL04495479
264	August 12, 2024 Deposition of Dr. Christopher James
265	Expert Rebuttal Report of Dr. Christopher James
266	September 13, 2023 Deposition of Roger Piñate
267	DEF082635, Text Exchange Between a Washington Post reporter and Mike Lindell Document produced by Defendants

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.



Timothy M. Frey

Executed on December 13, 2024